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*Attorneys for Creditors,
Majesti Mai Bagorio, et al.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**JOINDER BY BAUM HEDLUND ARISTEI
GOLDMAN CAMP FIRE VICTIMS
CLIENTS IN AMENDED LIMITED
OBJECTION AND RESERVATION OF
RIGHTS OF THE OFFICIAL COMMITTEE
OF TORT CLAIMANTS [Dkt. No. 6713] TO
MOTION OF DEBTORS FOR ENTRY OF AN
ORDER APPROVING (I) AGREEMENT
AND SETTLEMENT WITH PEOPLE OF
THE STATE OF CALIFORNIA AND (II)
GRANTING RELATED RELIEF [Dkt. No.
6418]**

Hearing: Telephonic Appearances Only
Date: April 14, 2020 (requested)
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 **TO THE CLERK OF THE ABOVE-ENTITLED COURT, THE DEBTORS AND THEIR**
2 **ATTORNEYS OF RECORD, UNITED STATES TRUSTEE, AND OTHER INTERESTED**
3 **PARTIES:**

4 Claimants Majesti Mai Bagorio, et al., (“Baum Hedlund Aristei Goldman Camp Fire
5 Victims Clients”) hereby join in the April 9, 2020 filing by the Official Committee of Tort
6 Claimants (“TCC”) entitled “Amended Limited Objection And Reservation Of Rights Of The
7 Official Committee Of Tort Claimants To Motion Of Debtors For Entry Of An Order Approving
8 (I) Agreement And Settlement With People Of The State Of California And (II) Granting Related
9 Relief [Dkt. No. 6418].” **[Dkt. No. 6713]**.

11 Substantively, the TCC’s amended limited objection and reservation of rights was to
12 Debtor Pacific Gas & Electric Corporation’s (“PG&E”) motion for entry of an order (i) approving
13 the Butte County Agreement entered into between the People of the State of California and the
14 Utility to settle and resolve the criminal prosecution and investigation of the Utility arising from
15 the November 8, 2018 Camp Fire and (ii) granting related relief. **[Dkt. No. 6418]**.

17 Besides the grounds raised by TCC, joining claimants Baum Hedlund Aristei Goldman
18 Camp Fire Victims Clients additionally urge this Court to consider:

19 PG&E, convicted of killing 84 people, decimating an entire community and way of life for
20 tens of thousands of victims of the Camp Fire, now has the temerity to “reinterpret” the language
21 of the Victim’s Trust Fund. PG&E’s audacity at trying to revictimize the dead and hurting confirms
22 that the corporate mentality remains the same despite protestations that it has become a “new”
23 company.
24

25 As PG&E is trying to undo the criminal plea and sentence to which it previously consented,
26 the plea should be reconsidered. That PG&E is a criminal enterprise has been confirmed by the
27 District Attorney and the prior federal criminal case. If PG&E is able to foist these criminal
28

1 penalties onto the backs of its victims and continue to benefit from its crimes, then the justice
2 system will have been coopted by the criminal.

3 Dated: April 9, 2020

Respectfully submitted,

4 BAUM HEDLUND ARISTEI GOLDMAN

5
6 /S/ Ronald L.M. Goldman

7 By: _____

Ronald L.M. Goldman
Diane Marger Moore, *Pro Hac Vice*
Attorneys for Creditors,
Majesti Mai Bagorio, et al.

1 **PROOF OF SERVICE**

2 I am over the age of 18 years and not a party to the within cause. My business address is
3 Baum Hedlund Aristei Goldman, 10940 Wilshire Boulevard, 17th Floor, Los Angeles, California
4 90024. On this day, April 9, 2020, I served the following document(s) in the manner described
below:

5 **JOINDER BY BAUM HEDLUND ARISTEI GOLDMAN CAMP FIRE VICTIMS**
6 **CLIENTS IN AMENDED LIMITED OBJECTION AND RESERVATION OF RIGHTS OF**
7 **THE OFFICIAL COMMITTEE OF TORT CLAIMANTS [Dkt. No. 6713] TO MOTION**
8 **OF DEBTORS FOR ENTRY OF AN ORDER APPROVING (I) AGREEMENT AND**
9 **SETTLEMENT WITH PEOPLE OF THE STATE OF CALIFORNIA AND (II)**
10 **GRANTING RELATED RELIEF [Dkt. No. 6418]**

11 **X** VIA ECF: I caused the aforementioned documents to be filed via the Electronic Case
12 Filing (ECF) system in the United States Bankruptcy Court for the Northern District of
California, on all parties registered for e-filing in Case Number Case No. 19-30088
(DM). Counsel of record are required by the Court to be registered e-filers, and as such
are automatically e-served with a copy of the documents upon confirmation of e-filing.

13 I declare under penalty of perjury, under the laws of the United States of America, that
14 the foregoing is true and correct. Executed on April 9, 2020.

15
16 Diane Marger Moore

17 DIANE MARGER MOORE
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